

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
LAFAYETTE DIVISION

TREMAINE RHINES, HALEY CAGE,
individually and on behalf of all similarly
situated individuals,

Plaintiffs,

v.

INDIANA PACKERS CORPORATION,

Defendant.

Case No.: 4:22-cv-00057-PPS-JPK

**JOINT MOTION TO SUBSTITUTE
SETTLEMENT AGREEMENT**

Named Plaintiffs Tremaine Rhines and Haley Cage and Defendant Indiana Packers Corporation, by and through their undersigned counsel, hereby request that the Court substitute and replace Exhibit 1 to the Parties' Memorandum of Law in Support of Joint Motion for Preliminary Approval of Class Settlement with the Amended Settlement Agreement and Release attached hereto as Exhibit 1. In support of this Motion, the parties show as follows:

1. On July 3, 2025, the Parties filed their Joint Motion for Preliminary Approval of Class Settlement ("Joint Motion"). As part of their filings in support of the Joint Motion, the parties submitted their Memorandum of Law in support of that Joint Motion.

2. In the course of filing the Memorandum of Law, the parties inadvertently attached a previous draft of the settlement agreement as Exhibit 1 to the Memorandum.

3. The correct version of the settlement agreement is attached hereto as Exhibit 1 and is titled the "Amended Settlement Agreement and Release."

4. The changes are limited to Paragraphs 2.i and 2.p in Section I. The changes will not impact the Parties' or the Court's analysis for preliminary approval of the settlement.

5. The parties respectfully request that the Court remove Exhibit 1 to the Memorandum of Law from the docket, replace and substitute that Exhibit with Exhibit 1 to this Motion and proceed to preliminarily approve the Amended Settlement Agreement and Release, preliminarily approve the class action settlement pursuant to Fed. R. Civ. P. 23(e) and approve the Fair Labor Standards Act (“FLSA”) collective action settlement under 29 U.S.C. § 216(b).

WHEREFORE, the Parties request the Court preliminarily approve the Amended Settlement Agreement and Release attached hereto as Exhibit 1, certify the Settlement Class for settlement purposes only, grant final approval of the FLSA settlement class and approve the service awards to the Named Plaintiffs.

Dated: July 10, 2025

Respectfully Submitted,

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